

OCT | 1986

September 26, 1984

Joel Balmat U.S. E.P.A. JFK Federal Building Boston, MA 02203

Dear Mr. Balmat:

Attached please find the revised paged for our SPCC plan. I apologize for not having them in the book.

OTHER:

If you have any questions of the pages, please give me a call.

Sincerely yours,

JET LINE SERVICES, INC

Jane Babbidge, Office Manager

#### 1.0 INTRODUCTION

Jet Line Pollution Control, Inc. of South Portland is a large waste oil dealer and is Maine's best equipped oil and hazardous material spill clean-up contractor. Jet Line provides a variety of services to clients, located throughout Maine and New England. These services involve collection and transportation of liquid and solid waste materials to licensed desposal sites. Most of the materials handled include waste petroleum oils, oily wastewaters and waste emulsions.

However, Jet Line also picks-up and transports small quantities of drummed hazardous wastes as part of the spectrum of services offered. All hazardous wastes collected by Jet Line are ultimately transported to licensed treatment/storage or disposal facilities in or out of state as appropriate.

The net result is that Jet Line has become a fully licensed transporter of hazardous wastes with permits to operate in Maine, New Hampshire, Vermont, Connecticut, Rhode Island, Massachusetts, New York and New Jersey. In order to support the small quantity aspect of transporting hazardous wastes, Jet Line operates a licensed hazardous waste, temporary storage facility at 106 Main Street, South Portland, Maine. As a TEMPORARY STORGAE FACILITY, no hazardous waste is on-site for more than ten (10) calender days. Usually, storage is five (5) days or less.

The overall purpose of this Plan is to conscientiously develop and implement a contingency plan designed to minimize hazards to human health or the environment from fires, explosions or any sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. Jet Line's HWC plan has been designed and personnel have been trained in such a way as to carry our theprovisions contained herein immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

Copies of Jet Line's Contingency Plan and all revisions will be:

- 1. Reviewed, approved and submitted to the Maine Department of Environmental Protection (Augusta and Portland offices).
- 2. Maintained at the 106 Main Street, South Portland, Maine facilities and are available for review by contacting Jim Eaton, General Manager at (207-799-0850).
- Submitted to the United States Environmental Protection Agency Region I, Boston, Massachusetts and the Coast Guard Station in Portland, Maine.
- 4. Submitted to South Portland Police department, fire department, and Maine Medical Center.

The intent here is to provide all local, state, and federal emergency response teams that may be called upon to provide emergency services with advance information to enhance the effectiveness of their responses.

The following Sections describe the facility in detail and documents all of the required operating standards and procedures. Jet Line's Contingency Plan

## 2.0 GENERAL INFORMATION

Section 2 presents ownership information, facilities descriptions, and past spill experiences as they relate to Jet Line's South Portland, Maine facilities located at 106 Main Street.

#### 2.1 NAME AND OWNERSHIP

Name: Jet Line Pollucion Control

106 Main Street

South Portland, Maine 04106 Telephone: (207) 799-0850

Manager: Jim Eaton

106 Main STreet

South Portland, Maine 04106 Telephone: (207) 799-0850

Service Area: New England States

## 2.2 DESCRIPTION OF FACILITIES

The Temporary Storage Facility is used for the transhipment of small quantities of hazardous wastes. The facility consists of a 25 ft long, 15 ft wide, 10 in high, impervious container. The floor of the container is concrete and the dike is made from cement blocks and cement. Maximum storage within the facility is 2,200 U.S. gallons when storing liquid in a single tier of 55 U.S. gallon steel drums.

The entire storage area is located in a warehouse that serves as a maintenance/storage garage for three large tractor trailer vacuum trucks and houses Jet Line's administrative offices. The relationship of the existing storage area to all other uses of the 106 Main Street site shown in the Site Plan, Figure 1. Additional details are presented in Figure 2.

Drums of material are wheeled into and out of the facility one at a time on a barrel dolly. The facility has a concrete ramp over the dike so that drums can be brought in and out at will without interrupting the integrity of the secondary containment area. Imcompatible materials are physically separated into different areas within the berm.

Tertiary protection from spills to the environment is provided by the warehouse floor which is sloped in the area of the berm toward a floor drain that is connected to the South Portland city sewer system.

The storage facility has been labeled as a hazardous waste storage area and is closed to the public. Fire protection is by portable, dry chemical fire extinguishers. Early fire warning is provided by two smoke detector/alarms located in the storage area.

Personnel communications are maintained by "beepers", a building wide public address system, portable radios that transmit and receive, and vehicular mounted two-way radios.

#### 3.0 GENERAL INFORMATION

Section 3 presents ownership information, facilities descriptions, and past spill experiences as they relate to Jet Line's South Portland, Maine facilities located at 106 Main Street.

#### 3.1 NAME AND OWNERSHIP

Name: Jet Line Pollution Control

106 Main Street

South Portland, ME 04106 Telephone: (207) 799-0850

Manager:

Jim Eaton

106 Main Street

South POrtland, ME 04106 Telephone: (207) 799-0850

Service Area:

New England States

# 3.2 DESCRIPTION OF FACILITIES

The bulk plant of Jet Line Pollution Control stores and recycles waste oil for industrial use. The locations of the two double tank installations are shown on the Site Plan, Figure 1, Drawing A-100-SK. The tanks operate at atmospheric pressures and a piping system has been provided to allow an inerting atmosphere of  ${\rm CO_2}$  and foam to be introduced in case of fire. Tank openings are situated beyond the 5-ft minimum distance from the nearest building, as required. Also, the storage facility is closed to the public, it has a concrete dike with security fence on the top and is equipped with (4) HDR-50 Kiddo Fire Systems and (4) remote release stations and an alarm bell.

Figure 2 provides additional details on the overall waste oil storage facility. As shown, the facility includes new construction plans that will add a rain shed and a concrete floor inside the containment area with a sump pit connected to an oily water separator of sufficient capacity to handle any forseeable spill occurrences within the dike. The discharge for the oily water separator will be to the City of South Portland's municipal treatment plant after securing all necessary permits.

The steel tanks are of standard design riveted and welded construction, and are in good condition. They have been previously used for storage of petroleum products. Each tank is 30-ft long and 10-ft in diameter and is divided by a cofferdam in the middle. The cofferdam is a double-wall divider with an air space between to decrease any possibility of compantments' contents being intermixed should a leak develop. Each compartment has a usable volume of about 8,500 gallons.

Each compartment is vented to the atmosphere via a goosenecked vent having a diameter equal in size to the drawoff and/or fill lines. This is in accordance with cited regulations Rule 9(a) 2(3). Each vent will be equipped with a listed flame arrester as part of Jet Line's safety program.

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# ENVIRONMENTAL INCIDENT/

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	Report By:
	Location:
cc.	Jim Eaton, General Manager Jane Babbidge, Office Manager
	Fay Babbidge, Operations Supervisor
	tallo Joyce, bai-ty Supervisor

24 HOUR SERVICE (207) 799 0850

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DESCRIBE THE INCIDENT		
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WHAT ACTION WAS TAKEN TO COR	RECT THE PROBLEM?	and the control of the section of th
WHEN IS THE PLAN TO PREVENT		

Jim Eaton, General Manager Jane Babbidge, Office Manager Ray Babbidge, Manager of Operatoins Chris Joyce, Safety Supervisor

#### 6.0 ENVIRONMENTAL INCIDENT REPORTING

Upon observing ANY type of discharge of any materials at the South Portland site, the following standard operating procedure must be followed to insure prompt evaluation and control of the incident.

- Person discovering the incident will initiate emergency procedures (see sections 6, 10, 11, 12, 13 for detailed emergency procedures) - stop flows where readily feasible, caution or evacuate personnel, plug all drains in the vicinity and immediately report to his/her Supervisor.
  - a. Exact material being discharged.
  - b. Location and possible flow of material.
  - c. Time observation was made.

The person discovering the incident will remain available until released by the Supervisor.

2. The Supervisor will immediately report above information to the following:

d.	Safety Supervisor - Chris Joyce	(office)	799-0850
		(home)	774-9069
b.	Manager of Operations - Ray Babbidge	(office)	799-0850
		(home)	829-3253
c.	General Manager - Jim Eaton	(office)	799-0850
		(home)	832-4538

The General Manager will be responsible for all other internal and agency reporting. He will report all aspects of the spill incident first to:

Corporate General Manager - Fred Wynn (office 617-843-2829)

- 3. After the initial report, the Reporting Supervisor must make an initial investigation and preliminary analysis of the following:
  - a. Where exactly is it now.
  - b. Estimate apparent dangers personnel, facilities.
  - c. Estimate nature of material and/or its use in case specific substance unknown. Do not waste time for detailed analysis here.
  - d. Determine sources where immediately feasible a quick look.
  - e. Implement procedures in SPCC Plan Section 6 and as appropriate to the plant site area of the spill.
- 4. Evaluation and control procedure to be followed to be determined by the Reporting Supervisor and the Safety Supervisor.

Their action must be immediate and have the following results:

- What the contaminant is, the volume of the spill, and how much has gotten outside the containment structures, or off-site that may have gotten into the groundwater, city sewers, or Portland Harbor.
- 3. What is being done to remove it from the hazard area.
- 4. What is being done to prevent further contamination.
- 5. What caused the accident to the best of your knowledge.
- 6. Each person and agency notified.
- 7. What is being done to prevent further occurrences. In addition, specific instructions for internal reporting and reporting to agencies are provided below in Section 6.1 and 6.2.

## 6.1 IN HOUSE ENVIRONMENTAL INCIDENT REPORTING

Upon confirmation of an oil or hazardous material spill, and assessment of the problem, the following persons shall be advised immediately by the reporting Supervisor:

- I. Safety Supervisor
- 2. Operations Supervisor
- 3. Plant General Manager
- 4. Coporate General Manager in Massachusetts

The Safety Supervisor, working closely with the General Manager shall be responsible for notifying all other corporate, production, business and environmental staff representatives.

A briefing of the incident is to be given to the Corporate Public Relations Manager. A plant management meeting shall be conducted to review all aspects of the spill incident.

A written confirmation of the in-house phone reports shall be submitted as shown of the form following this page, with copies of all site management personnel and others contacted by phone.

#### 6.2 REGULATORY AGENCIES ENVIRONMENTAL INCIDENT REPORTING

Reporting of environmental incidents to regulatory agencies will be done by the General Manager, Jim Eaton, working closely with the Corporate General Manager, Fred Wynn (Tel. 617-843-2829), Massachusetts. In his absence, the Manager of Operations, Ray Babbidge or his designated representative will assume responsibility.

Both State and Federal law requires prompt reporting of oil and other polluting materials spills.

For advising Maine Department of Environmental Protection call:

## 7.0 SPILL REPORTING

Upon observing ANY type of discharge of any materials at the South Portland site our damage to adjacent property, the following standard operating procedure must be followed to insure prompt evaluation and control of the incident.

- a. Person discovering spillage will initiate emergency procedures (see Sections 6, 10, 11, 12, 13 for detailed emergency procedures) stop flows where readily feasible, caution or evacuate personnel, plug all drains in the vicinity and immediately report to his/her Supervisor.
  - (1) Exact material being discharged.
  - (2) Location and possible flow of material.
  - (3) Time observation was made.

The person discovering the spill will remain available until released by the Supervisor.

b. The Supervisor will <u>immediately</u> report above information to the following:

Safety Supervisor - Chirs Joyce	(office)	799-0850
	(home)	774-9069
Manager of Operations - Ray Babbidge	(office)	799-0850
	(home)	829-3253
General Manager - Jim Eaton	(office)	799-0850
	(home)	832-4538

The General Manager will be responsible for all other internal and agency reporting. He will report all aspects of the spill incident first to:

Corporate General Manager - Fred Wynn (office) 617-843-2829

- c. After the initial report, the Reporting Supervisor must make an initial investigation and preliminary analysis of the following:
  - (1) Where exactly is it now.
  - (2) Estimate apparent dangers personnel, facilities.
  - (3) Estimate nature of material and/or its use in case specific substance unknown. Do not waste time for detailed analysis here.
  - (4) Determine sources where immediately feasible a quick look.
  - (5) Implement procedures in SPCC Plan Section 6 and as appropriate to the plant site area of the spill.

personnel and others contacted by place.

# 7.2 REGULATORY AGENCIES OIL SPILL REPORTING

Reporting of oil spill incidents to regulatory agencies will be done by the General Manager, Jim Eaton, working closely with the Corporate General Manager, Fred Wynn (617-843-2829), Massachusetts. In his absence, the Manager of Operations, Ray Babbidge, or his designated representative will assume responsibility.

Both State and Federal law requires prompt reporting of oil and other polluting materials spills.

For advising Maine Department of Environmental Protection, call:

1-800-482-0777 (Portland & Augusta, Maine) 773-6941 (24-hour Portland, Maine)

To advise the United States Environmental Portection Agency call:

1-800-424-8802 (U.S. E.P.A. Washington, DC)

All numbers are twenty-four hour/day, seven day/week.

Similar information will be requested by both parties. The most likely information will be:

- a. Name of reporting party and a telephone number.
- b. Location and company.
- c. Waterway affected and river mile (if appropriate otherwise nearest lake, stream, river, or harbor).
- d. Description of the incident, time, amount of and type of spill.
- e. Potential to pollute groundwater and/or drinking water supplies and/or surface waters.
- f. Danger to people, property and natural resources.

For most situations the D.E.P. regional office in Portland should be advised as they will be following up the incident. The initial D.E.P. notification will be relayed back to their regional office at Portland for investigation. Prior contact with the local offices would be helpful to all concerned.

The U.S. E.P.A. notification will be relayed back to their regional office in Boston. Confirming phone calls can be expected back from both agencies. Someone should be available at the phone number supplied the agencies in the initial spill reporting message. The follow-up calls will request a more detailed description of the incident, clean-up plans, local conditions, etc.



# ENVIRONMENTAL INCIDENT/ EMERGENCY

TO: Jim Eaton, South Portland	
Date of Report:	
Date of Incident:	
What Happened:	
Who Was Notified:	
Company:	
Regulatory Agency:	
1*	
Action Taken:	
And the second control of the second control	
	Reported By:
	Location:

cc: Jane Babbidge, Office Manager Ray Babbidge, Manager of Operations Chris Joyce, Safety Supervisor

# 9.0 INVENTORY CONTROL

In general, inventory control is implemented through Office Manager, Jane Babbidge, and the General Manager, Jim Eaton. Records are maintained of "all hazardous waste pickups, deliveries, and transhipments. The General Manager receives regular manifests and other reports as a means of managing a secondary aspect of Jet Line's business, that of shipping hazardous waste to properly licensed disposal sites. In each case, loss of material will be detected at this level if, for some unknown reason, it goes undetected or unreported by Operations Personnel. It is worth emphasizing here that economics is a very significant factor in materials control and management. Spilled material always represents an economic loss and may only potentially cause environmental consequences. As a business in a very competitive market, spills will be avoided as a matter of cost consciousness as well as environmental responsibility.

## 10.0 INVENTORY CONTROL

In general, inventory control is implemented through Office Manager, Jane Babbidge, and the General Manager, Jim Eaton. Records are maintained of all oil pickups, deliveries and transshipments. The General Manager receives regular oil handling reports as a means of managing a primary aspect of Jet Line's business, that of recycling waste and spilled oil. In each case, loss of material will be detected at this level if, for some unknown reason, it goes undetected or unreported by operations perosnnel. It is worth emphasizing here that economics is a very significant factor in materials control and management. Spilled material always represents an economic loss and may only potentially cause environmental consequences. As a business in a very competitive market, spills will be avoided as a matter of cost consciousness as well as environmental responsibility.

# G. REGULATORY AND LEGAL CONSIDERATIONS

- 1. Important Spill Prevention Regulations
- 2. Important Oil Spill Laws and Regulations
- 3. Roles
- 4. Practical Advice
- 5. Documenting/Sampling

#### H. CONTINGENCY PLANS

- 1. Type of Information
- 2. Organization for Implementation of the Plan
- 3. Activation
- 4. Practical Advice

## DRIVER TRAINING COURSE OUTLINE

The emphasis of Jet Line training is related to transportation issues because these are the issues most dramatically affecting the mainstay of the company's business. The program is as follows:

#### A. Classroom Instruction and On The Job Training:

 The General Manager of Jet Line in Maine has attended several hazardous waste training programs and acts as the person responsible for maintaining compliance for the company in the areas of planning and training.

Jet Line holds (1) monthly meeting for all drivers. The purpose of this meeting is to provide updates about applicable rules and regualtions pertaining to the conveyance of hazardous wastes.

When a driver first comes to work at Jet Line he is required to attend a formal short course on DOT and EPA rules offered by a number of competent consulting/teaching firms. Of course if the driver already has completed one of these seminars he does not have to attend.

Also, Jet Line takes advantage of ecery opportunity in real world situations (on the job) to pass information to as many people as possible whenever there is a chance to learn something.

2. The company supplies the drivers with relevant technical information about the materials that they shall be carrying prior to the job. Copies of emergency guides from the Hazardous Materials 1980 Emergency Response Guidebook DOT P5800.2 are provided to every driver on every trip so that in the event of an emergency the technical information on safety procedures is readily available.

Each licenses conveyance is driven by a licensed driver only.

A copy of a drivers manual is attached to this section as it contains all the instructions and telephone contacts etc. that are required two be listed here.

3. Drivers are made aware of the procedures to be taken should an accident occur to protect their own safety. Aside from that drivers are not instructed in remedial actions. Drivers are aware of the State and Federal reporting requirements.

## B. Preparedness and Prevention:

- All vehicles transporting hazardous wastes are equipped with company owned 2-way radios and/or citizens band radios.
- 2. Each vehicle carries a portable  ${\rm CO}_2$  or dry chemical fire extinguisher located in the cab.
- Jet Line has a copy of its operating plan on file with the South Portland Fire Department (copy attached).

# C. Contingency Plan and Emergency Procedures:

See Drivers Manual in Planning and Training Section.

## EMERGENCY PROCEDURES

In the event of a spill the driver shall do the following:

- 1. If a phone is readily available the driver shall:
  - a. notify local officials
  - b. notify company office
  - c. notify state and federal government

and supply them with the following information:

- a. name and phone number of reporter
- b. location of incident
- c. time and type of incident
- d. name and quantity of materials involved
- e. any injuries
- f. possible hazards to population or environment
- If a phone is not readily available the driver should stop a passing motorist and instruct him to immediately notify local officials of the situation and have them respond to the site.
- 3. He must then ascertain what effect the spillage will immediately have to human health and the environment.
- If there is any immediate action that can be taken to prevent environmental damage he shall try to the best of his ability to prevent it.
- If in his opinion the area should be evacuated he should notify local officials on their arrival.
- The driver shall assist local officials in any way possible until the emergency is over.
- 7. The driver must submit to the Regional Administrator of the US EPA within 15 days of the incident a written accident report.

#### EMERGENCY PHONE NUMBERS

Call the NEAREST Jet Line Office

- 1. 207-799-0850 24 hour South Portland, Maine
- 2. 603-749-5735 24 hour Lee, New Hampshire
- 3. 617-843-2829 24 hour Stoughton, Massachusetts
- 4. Key Personnel

# a. South Portland, Maine

Jim Eaton 207-832-4538 Ray Babbidge 207-829-3253 Brian Phinney 207-929-4701

# b. Lee, New Hampshire

Justin Locke 603-332-5743 David Gervais 603-692-5528

# c. Stoughton, Massachusetts

Gerry Mayo 617-587-9107 Doug Parsons 617-580-0523

Federal Reporting Number	1-800-424-8802	
EPA - Region I	1-617-223-7265	
or	1-617-861-6700	
State of ME	1-800-482-0777	
State of NH	1-603-271-3503	(days)
	1-603-271-3636	(nights & holidays)
State of MA	1-617-727-6373	(days)
	1-617-566-4500	(nights & holidays)

The driver shall ensure that a completed, signed, manifest is provided by the client prior to loading the materials.

The driver shall exercise caution when loading the materials. The driver shall be responsible to see that the transfer hose and fittings are in good condition and compatible with the materials being handled.

If at any time the driver suspects that the material is behaving in a manner other than what he was told to expect from his Material Safety Data Sheets and project planning session, he should cease transferring immediately and not resume again until he is assured that everything is correct.

Appropriate safety gear shall be on hand in the Jet Line vechicle prior to handling or transport of any bulk liquids.

#### CONTINGENCY PLAN

ALL spills of hazardous materials and/or waste must be reported to the state and federal government regardless of the volume involved.

In all cases, the driver involved should report any accidents or spills to Jet Line headquarters in South Portland.

As transportation of these hazardous materials and wastes often involve crossing state lines there are several spill reporting numbers that must be available to the driver. These are:

Federal	1-800-424-8802	
EPA - Region I	1-617-223-7265	
or	1-617-861-6700	
State of ME	1-800-482-0777	
State of NH	1-603-271-3503	(days)
	1-603-271-3636	(nights & holidays)
State of MA	1-617-727-6373	(days)
	1-617-566-4500	(nights & holidays)

Jet Line Key Personnel with training in hazardous wastes:

Name	<u>Title</u>	Home Phone
Jim Eaton	Generar Manager	832-4538
Ray Babbidge	Manager of Oper.	829-3253
Brian Phinney	Oper. Supervisor	929-4701
Chris Joyce	Safety Super	774-9069

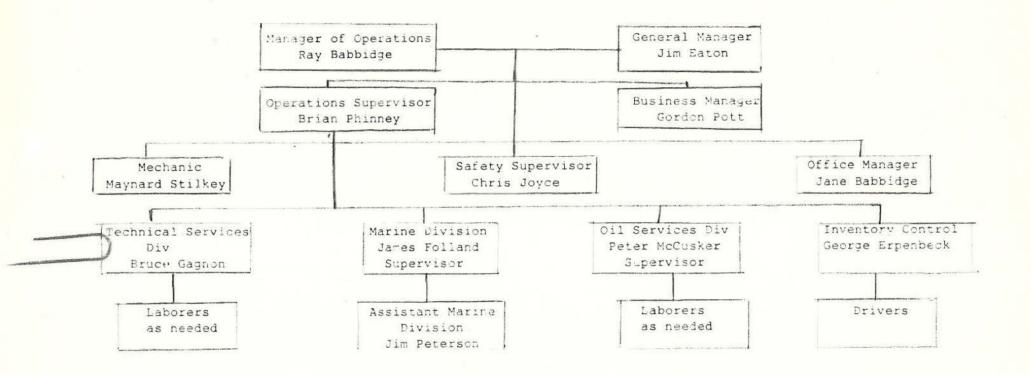


FIGURE 5. JET LINE POLLUTION CONTROL ORGANIZATION CHART